

Hal Taylor, Esq.
Of Counsel, Olinsky Law Group
NV Bar No.: 4399
2551 West Lakeridge Shores
Reno, NV 89519
Tel: (775) 825-2223
Fax: (775) 329-1113
Email: HalTaylorLawyer@gbis.com

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DONALD AMBROSE MOODY,

Plaintiff,

v.

KILOLO KIJAKAZI¹,
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO. 2:21-cv-01057-VCF

**CONSENT MOTION
FOR EXTENSION OF TIME TO FILE
PLAINTIFF'S BRIEF**

Plaintiff, Donald Ambrose Moody, by his attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a forty-five (45) extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed November 15, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel.

Wherefore, Plaintiff requests an extension from December 30, 2021 up to and including

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on 7/9/2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted for Andrew Saul as the Defendant in this suit.

1 January 29, 2022 to file her brief. Counsel for the Plaintiff has conferred with Defendant's
2 Counsel who kindly consents to this request.

3 Dated this 8th day of November, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.

7 Of Counsel, Olinsky Law Group

8 NV Bar No.: 4399

9 2551 W. Lakeridge Shores

10 Reno, NV 89519

11 Tel: (775) 825-2223

12 Fax: (775) 329-1113

13 HalTaylorLawyer@GBIS.com

14 **Plaintiff's Certificate of Service:**

15 I certify that I caused the Motion for Extension of Time to be served today, November 8,
16 2021, by CMECF to Christopher Chiou and Daniel P. Talbert, who are the filing users of the
17 CM/ECF system.

18 /s/Hal Taylor

19 Hal Taylor, Esq.

20 IT IS SO ORDERED.

21 

22 Cam Ferenbach

23 United States Magistrate Judge

24 DATED 11-15-2021

25